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Attorneys for Defendant
BUYERQUEST, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TRADESHIFT, INC., a Delaware corporation,

Plaintiff,

v.

BUYERQUEST, INC., an Ohio corporation,

Defendant.

Case No. 3:20-cv-1294-RS

**STIPULATION AND ORDER TO
MODIFY CASE SCHEDULE
AS MODIFIED BY THE COURT**

STIPULATION TO MODIFY CASE SCHEDULE

Tradeshift, Inc. (“Tradeshift”) and BuyerQuest, Inc. (“BuyerQuest”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, the Court issued an Initial Case Management Order on June 2, 2020 (ECF 36) identifying certain deadlines for fact discovery, expert reports, expert discovery, and dispositive motions;

WHEREAS, pursuant to the Stipulation of the parties, on January 21, 2021 (ECF 52), the Court entered an Order modifying certain discovery deadlines set by the Initial Case Management Order;

WHEREAS, the parties have engaged and continue to engage in good faith conferrals regarding discovery and preparation of the case for trial;

WHEREAS, the parties agree they will need additional time to complete depositions and, as a result, have stipulated to a proposed revised schedule for completing discovery,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their respective counsel of record and subject to the approval of the Court, that the dates in the January 21, 2021 Stipulation and Order to Modify Discovery Deadlines shall be modified as follows:

Event	Current Deadline	New Deadline
Fact Discovery Cutoff for written discovery and production of documents.	March 22, 2021	April 2, 2021
Fact Discovery Cutoff for non-expert depositions.	March 22, 2021	April 30, 2021
Opening Expert Reports	April 26, 2021	May 14, 2021
Rebuttal Expert Reports	May 24, 2021	June 11, 2021
Expert Discovery Cutoff	June 21, 2021	July 9, 2021
Dispositive Motion Hearing	August 5, 2021	September 9, 2021
Pretrial Conference	October 20, 2021	No Change

1	Trial	November 1, 2021	No Change ¹
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3 Dated: February 19, 2021

By: /s/ Amy K. Van Zant
AMY K. VAN ZANT
Attorneys for Plaintiff
TRADESHIFT, INC.

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6 Dated: February 19, 2021

By: /s/ Anthony Phillips
ANTHONY PHILLIPS
Attorneys for Defendant
BUYERQUEST, INC.


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8
9 **ATTESTATION**

10 I attest that, under Civil Local Rule (5-1)(i)(3), I have obtained concurrence in the filing of
11 this document from all Signatories.

12
13 /s/ Jason K. Yu
Jason K. Yu

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15 **IT IS SO ORDERED**

16
17 Dated: 2/19/2021

18 
19 RICHARD SEEBORG
20 Chief United States District
21 Judge

22 ¹